



MEMO ENDORSED

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January 2, 2020

VIA ECF

Hon. Edgardo Ramos
United States District Judge
United States District Court for the Southern District of New York
40 Foley Square, Courtroom 619
New York, NY 10007

Re: Diaz v. Stamps.com Inc., Civil Action No.: 1:19-cv-08268

Dear Judge Ramos:

This firm represents Defendant Stamps.com Inc. ("Defendant") in the above-referenced action. We write, with Plaintiff's consent, to respectfully request an extension of the deadline to respond to the Complaint, up to and including February 5, 2020.

By way of background, the original deadline for Defendant to respond to the Complaint was September 30, 2019. On September 19, 2019, the Court granted the parties' first request for an extension of this deadline. (ECF No. 7.) Defendant then engaged counsel and the undersigned filed a Notice of Appearance on October 24, 2019. (ECF No. 8.) On October 25, 2019, the Court granted Defendant's second request for an extension of the responsive pleading deadline. (ECF No. 10.) On November 26, 2019, the Court granted Defendant's third request for an extension of this deadline. (ECF No. 12.) Pursuant to the Court's Order, Defendant's current deadline to respond to the Complaint is January 6, 2020. (*Id.*)

The parties have exchanged several settlement proposals and anticipate having additional discussions in the immediate near term. Defendant respectfully requests that the Court extend the responsive pleading deadline by an additional thirty (30) days, to February 5, 2020, in order to allow the parties to continue to focus their resources and attention on a potential non-litigated resolution. Recognizing that this would be the fourth extension of this deadline, Defendant does not anticipate requesting an additional extension absent extraordinary circumstances.

The proposed extension would not affect any other scheduled dates. The undersigned has communicated with counsel for Plaintiff, and Plaintiff consents to this request. We thank the Court for its time and attention to this matter, and for its consideration of this application.



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Respectfully submitted,

SEYFARTH SHAW LLP

/s/ John W. Egan

John W. Egan

cc: All counsel of record (via ECF)

The application is granted. Barring exceptional circumstances, further extension requests will be denied.

SO ORDERED:

A handwritten signature in black ink, reading 'Vernon Broderick', with a small 'v' above the 'i' in 'Broderick'.

HON. VERNON S. BRODERICK 1/2/2020
UNITED STATES DISTRICT JUDGE

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